

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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Agenda Item 4 (a)

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

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COMMENTS ON

PROPOSED DRAFT REVISED GUIDELINES FOR THE APPLICATION OF THE HACCP SYSTEM

In response to CL 2000/36-FH the following; Argentina, Cuba, India, Peru, South Africa, Paraguay, Thailand, Uruguay, and the United States of America, submitted comments.

General Comments

CUBA

The Draft Revised Guidelines for the Application of the HACCP System has been adopted as a recommended standard in our country, but its implementation will be done gradually. This aspect should be very close to what is proposed for small and medium sized businesses.

INDIA

1. This Annex (**Obstacles to the application of HACCP, particularly in SLDBs and approaches to overcome them**) should be given reference in the main HACCP document and should be appended to the same.
2. Elaboration on how to apply the different steps for SLDBs to be included in this document.
3. In addition, the following aspects need specific clarification with regard to the application in SLDBs:
 - Primary product
 - Seasonal nature of production
 - Different immunity levels
4. Minimum records for SLDBs to be specified.

5. Minimum verification in SLDBs to be given to be limited to review of records and random testing of end products. However, the verification under regulation shall be designed as needed for the specific foods based on risk.

PERU

In relation to the referenced document, we agree that this matter should continue to advance within the Codex framework, since it will be of great technical and scientific interest to the SLDBs, which are the majority of the companies in our country.

SOUTH AFRICA

South Africa is generally in agreement with the amendments made to the document and is pleased with the references to small and/or less developed businesses and for the recognition for flexibility when applying HACCP.

THAILAND

Thailand generally agrees with these two documents but would like to request CCFH to recognize the difficulties of SLDBs in some countries in implementing all seven principles of HACCP system.

In Thailand, for example, there are some kinds of multi-products businesses with considerably varying nature of food preparation as well as food servicing process such as street food vendors or small servicing food businesses (e.g. small food shops or restaurants). For these businesses, food preparation can be wholly cooked, partially cooked or only mixed various ingredients together without heating. The serving, moreover, can be in place or take-home. It is difficult, therefore, for these kinds of businesses to establish the critical limits and critical control points. In certain cases, only visual inspection can be used as monitoring and there are not sufficient data and technical information to set the corrective actions. Data recording and verification is not feasible for such businesses.

In our opinion, it would be appropriate to encourage these kinds of businesses to implement firstly only some principles of HACCP system and when their systems are gradually improved and more experiences are gained, the whole HACCP system will be implemented.

UNITED STATES OF AMERICA

The United States supports the proposed revisions to the *International Recommended Code of Practice: General Principles of Food Hygiene* (GPFH) Guidelines for the Application of the HACCP System (HACCP Annex) and recommends that the Committee advance the revised Guidelines to Step 8 of the Codex Process. The proposed revisions incorporate important information that makes the document more user-friendly and complete.

The United States notes however that further detail is still needed on important aspects of HACCP (e.g., how to conduct hazard analysis and critical limit determination as well as the validation of control measures used to control food safety hazards). The United States encourages the Committee to support efforts underway elsewhere (e.g., the Proposed Draft Code of Hygienic Practice for Milk and Milk Products as well as the Validation document) so that these important HACCP related concepts can become fully operational thus improving their practical application.

FIRST PARAGRAPH**INDIA**

Scope of the guidelines to be included in the document after "Definitions".

Paragraph 1, Sentence 2 has already been covered in the document at different places and does not need to be over emphasised. Further, verification of prerequisite programmes including training would be difficult.

SOUTH AFRICA

First sentence, South Africa recommends that the phrase **".....that sector should be operating under good hygienic practices according to the Codex General Principles...."** be amended to read as follows: **"that sector should have in place prerequisite programmes such as good hygienic practices according to the Codex General Principles...."**. South Africa is of the opinion that reference should be made to prerequisite programmes earlier on in the paragraph so that the last sentence becomes more meaningful.

FIFTH PARAGRAPH**INDIA**

The second sentence does not have any meaning as CCPs are a part of HACCP and not GHPs and it has already been indicated that GHPs are a pre-requisite to HACCP. The sentence therefore needs to be deleted.

SOUTH AFRICA

In the last sentence replace the phrase **" in the product, process, or any step"** with the phrase **"to the product or any step in the process"**.

URUGUAY

Last sentence (Spanish version) delete the word "examinar" and substitute "revisar."

SEVENTH PARAGRAPH**URUGUAY**

Beginning in the 7th paragraph, there is mention of **"autoridades reglamentarias" // "regulatory authorities"**// Uruguay suggests changing this to **"autoridades oficiales o reguladoras" // "official or regulatory authorities"**//.

EIGHTH PARAGRAPH**INDIA**

This paragraph to be deleted as this aspect has already been included in Paragraph 2 and the paragraph on training.

APPLICATION**THAILAND**

In this connection, Thailand would like to propose the addition of the following paragraph to the Proposed Draft Revised Guidelines for the Application of HACCP system (ALINORM 03/13 Appendix III). The new paragraph can come before the section "Application" as follows.

“However, for small and less developed businesses with considerably varying nature of food preparation and servicing process some steps of HACCP principles such as data recording and verification may not be applied. Other alternative food safety measures should be considered.”

1. Assemble a HACCP team

INDIA

Third sentence, in the fourth line "should" to be changed to “may ” to read as "...expert advice **may** be obtained from other sources ...".

SOUTH AFRICA

South Africa recommends that the last sentence of this section “**It may be possible**” should be moved to immediately after the 3rd sentence to read as follows: **Where such expertise is not available on site, expert advice should be obtained from other sources, such as, trade and industry association, independent experts, regulatory authorities, HACCP literature and HACCP guidance (including sector-specific HACCP guides). It may be possible that a well-trained individual with access to such guidance is able to implement HACCP in-house.**

URUGUAY

Spanish version, delete the first sentence and substitute the following: "La empresa alimentaria deberá asegurarse de que dispone de los cocimientos y expertos adecuados a fin de formular un plan eficaz HACCP para sus productos específicos." (corrects translation)

Spanish version , third sentence, after "...fuentes, por ejemplo" delete rest of the sentence and substitute the following: ", asociaciones comerciales e Industriales, expertos independientes y autoridades de reglamentación, literatura sobre el sistema de HACCP y la orientación para su uso (incluidas las guías para aplicar el sistema de HACCP en sectores específicos). Se debe determinar el ámbito de aplicación del plan de HACCP, que debe describir el segmento de la cadena alimentaria al que **se aplica** y las clases " (corrects translation)

Spanish version, delete the last sentence and substitute the following: "Es posible que una persona con la formación adecuada que tenga acceso a dicha orientación pueda aplicar el sistema de HACCP en la empresa." (corrects translation)

2. Describe product

INDIA

The last sentence to be modified as follows: "Within businesses with multiple products, for example, catering operations, it may effective to a group products with similar characteristics, **hazards** or processing steps, for the purpose of development of the HACCP Plan.

4. Construct flow diagram

INDIA

Add the following at the end of the second sentence: "/group of products" to read as “ the flow diagram should cover all steps in the operation for a specific product/group of products”.

5. On-site confirmation of flow diagram

PARAGUAY

Paraguay believes there is coincidence (connection) between point 5. *On-site Confirmation of the Flow Diagram*, and point 1. *Forming the HACCP Team*. The following modification (underlined and bolded) should be made to the last sentence. "The confirmation of the flow diagram should be carried out by the **HACCP team** or by a person or persons that have sufficient knowledge of the processing activities, **as described in point 1**"

6. *List all potential hazards associated with each step, conduct a hazard analysis, and consider any measures to control identified hazards.*

ARGENTINA

The determination of control measures cited in point 6, Hazard Analysis, should be handled within point 7, "DETERMINATION OF CCPs."

In Diagram N° 3, we should consider putting in a column for "verification" (PRINCIPLE 6)

INDIA

Modify first paragraph as follows: "The HACCP team (see also paragraph 1 above) should list all of the hazards that may be reasonably accepted to occur at each step, according to the **identified** scope **which may include one or more of the stages namely** primary production, processing, manufacture, **or** distribution until the point of consumption.

SOUTH AFRICA

First sentence, it is recommended that the phrase in brackets, "(see also paragraph 1 above)" is confusing and should be deleted.

URUGUAY

Spanish Version, first paragraph, after "...la elaboracion" delete the rest of the sentence and substitute the following: "..., almacenamiento y la distribución hasta el momento del consumo."

8. *Establish critical limits for each CCP*

INDIA

Paragraph 2: the first sentence of the para. may be modified as follows: "Where expertly developed HACCP guidance **or scientific literature** has been used to establish the critical limits-----".

The second sentence may not always be true as under certain cases the critical limits may not be measurable and may be qualitative, for example, in the case the critical limit is boiling, the same would be observed visually and would not need to have any specific measurable value. The sentence may therefore be deleted.

11. *Establish verification procedures*

INDIA

Last paragraph: "**where appropriate**" to be modified to "**where possible**" as per the original version.

The following paragraph to be added: "Verification in SLDBs shall be limited to review of records and random testing of end products. However, the verification under regulation shall be designed as needed for the specific foods based on risk".

URUGUAY

Spanish version, title and throughout the document delete the word "comprobación" and substitute it by the word "**Verificación.**"(corrects translation)

12. Establish Documentation and Record Keeping**ARGENTINA**

Delete the last bullet, "modifications to the HACCP system."

The sentence following the last bullet, delete "del Sistema" from the Spanish version of the document.

INDIA

Paragraph 1, the additions may be deleted. The words " and sufficient to assist the business to verify that the HACCP controls are in place and being maintained" are not necessary. The last sentence has already been given in the introduction of the document and is not necessary here.

TRAINING**INDIA**

Paragraph 1, Last sentence – " As an aid in developing specific training support to HACCP Plan, working instructions and procedures should be developed which define the tasks of the operating personnel to be stationed at each critical point" to be deleted as the same is not relevant under this heading.